

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**Clearview AI, Inc.,**

**Petitioner/Plaintiff**

**v.**

**DECLARATION OF JOHN P. DEAN**

**Investigative Consultants, Inc.**

**and**

**Case No. 1:25-cv-00049**

**Donald Berlin,**

**Respondents/Defendants**

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John P. Dean deposes and states the following under oath:

1. I am over eighteen years of age and of sound mind, am counsel to Investigative Consultants, Inc. (“ICI”) and Donald M. Berlin (together “Respondents/Defendants”). I am competent to testify to the facts set forth herein and, if called as a witness and placed under oath, would so testify.

2. Exhibit 1 to the attached Motion is a true and correct copy of Claimant Clearview, AI’s Arbitration Demand (excluding the exhibits thereto).

3. Exhibit 2 to the attached Motion is a true and correct copy of Claimant Clearview, AI’s Amended Arbitration Demand.

4. Exhibit 3 to the attached Motion is a true and correct copy of Respondents/Defendants’ Answer, Affirmative Defenses, and Counterclaim to the Arbitration Demand.

5. Exhibit 4 to the attached Motion is a true and correct copy of Respondents/Defendants’ Motion to Modify the Arbitration Award.

I declare under penalty of perjury according to the laws of the United States of America that the foregoing is true and correct.

January 16, 2025

**/s/ John P. Dean**  
John P. Dean